

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	Case no. 1:25-MJ-290
)	
vs.)	The Hon. Lindsey R. Vaala
)	
)	Trial Date: September 4, 2025
)	
CHHIPA, IRFAN AYUB,)	
Defendant.)	

DEFENSE COUNSEL’S MOTION TO WITHDRAW AS COUNSEL

COMES NOW counsel for the Defendant, Mr. IRFAN CHHIPA, and respectfully moves this Honorable Court to allow Mr. Willie Mejia, with the Patrick Anderson Law Firm, to withdraw from representation of Mr. Chhipa in this case. In support of his motion, counsel states the following:

1. Mr. Chhipa retained the Patrick Anderson Law Firm on May 7, 2025 for representation in this case, and counsel entered his appearance on May 10. This court set a status date for that matter for July 1, 2025. On July 1, 2025, the court set the matter for a bench trial on September 4, 2025.
2. Counsel requested discovery from the government—Mr. Nathaniel Lowry—and the government provided discovery to counsel, in two separate disclosures, on June 10, 2025, and July 28, 2025.
3. On June 26, 2025, counsel met with Mr. Chhipa and his brother to review the discovery and discuss the case. Prior to this meeting, Mr. Chhipa had already expressed to counsel that that he did not trust or agree with defense counsel’s strategy and analysis for the

case, and there was a dispute over whether or not Mr. Chhipa would even sign the formal fee agreement, as he had initially refused to do so. Mr. Chhipa had also verbally told counsel that he wanted to discharge the firm from representation and represent himself. On June 24, counsel even sent a text message to Mr. Chhipa, requesting a signed letter confirming that Mr. Chhipa was discharging counsel from the case. At that time, Mr. Chhipa indicated that in fact, he would choose to continue with the firm's representation, and thus the matter had appeared to be resolved.

4. Counsel has reviewed the discovery material provided by the government, and has spoken to Mr. Chhipa and his brother multiple times regarding the case, and indeed, was preparing for the September 4th hearing with the expectation that the trial would go forward on September 4th.
5. On September 2nd, 2025, counsel met with Mr. Chhipa and his brother to finalize preparations for trial. Over the course of the meeting, in which defense counsel repeatedly attempted to explain the trial strategy, Mr. Chhipa repeatedly refused to listen to counsel's explanations; accused defense counsel of lying to him with respect to what evidence the government had provided; accused counsel of manipulating the video evidence and claiming that counsel was showing him a different video; and, expressed a total lack of faith and trust in defense counsel's ability to try the case. Further, Mr. Chhipa repeatedly asked counsel to file frivolous motions, and to continue the case to file such motions, which counsel refused to do. The meeting ended when both Mr. Chhipa and his brother walked out of counsel's office, and Mr. Chhipa stated without equivocation that he no longer wanted counsel to represent him and did not want counsel to try the case. Mr. Chhipa specifically requested for counsel to withdraw from the case.

6. At this time, counsel believes the attorney-client relationship has broken down irreparably. Despite counsel's best efforts up to the eve of trial, the communication between counsel and Mr. Chhipa has now become ineffective, and counsel can no longer zealously represent his client (and indeed has been directed by the client *not* to continue representation). Pursuant to Rule 1.16(a)(3) of the Virginia Rules of Professional Conduct, counsel may move to withdraw from representation when the lawyer is discharged by the client, subject to the request being granted by this court pursuant to Local Criminal Rule 57.4(G). It is counsel's understanding that Mr. Chhipa intends to hire another attorney to represent him.
7. Counsel has conferred with the government, Mr. Nathaniel Lowry, on September 2nd. The government takes no position as to Mr. Chhipa's discharge of counsel, but intend to proceed with trial on September 4.

Accordingly, counsel respectfully moves to withdraw as counsel for Mr. Chhipa. Counsel shall provide Mr. Chhipa with a copy of this motion.

Respectfully Submitted,
IRFAN CHHIPA
By Counsel

PATRICK N. ANDERSON & ASSOCIATES, P.C.

/s/

Willie Mejia, Esquire
Counsel for Defendant.
333 N. Fairfax Street, Suite 310
Alexandria, VA 22314
T: (703) 519-7100
F: (703) 519-7104
Email: wmejia@pnalaw.com
VA Bar: #93669